

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN

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In the Bankruptcy of  
ROGER PETER RINALDI and  
DESA LILLY RINALDI,  
Debtors

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Case No. 11-35689

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MOTION FOR RESCHEDULED HEARING ON  
MOTION TO LIFT AUTOMATIC STAY AND FOR ABANDONMENT

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NOW COMES Wendy Alison Nora, counsel for the Debtors, and respectfully moves the Court to reschedule the hearing now set for December 5, 2011 at 2:00 p.m. for good cause and shows the Court:

1. Debtors' counsel filed the Response to the Motion to Lift Automatic Stay and for Abandonment on November 18, 2011.

2. On November 17, 2011, the day before she filed the Response, she made airline reservations to fly to Denver Colorado to attend a seminar at the University of Denver Graduate Tax Program on November 30, 2011 for a two-day seminar being held on December 1 and 2, 2011 for which she would earn 16 Continuing Legal Education (CLE) credits. (Exhibits A and B)

3. Exhibit A shows that the return flight to Minneapolis, Minnesota departs from Denver, Colorado on December 5, 2011 at 1:40 p.m. MT, which is 2:40 p.m. CT. Debtors counsel will be at the Denver airport and in the process of boarding an airplane at the time set for the hearing.

4. On November 21, 2011, Debtors' counsel received the scheduled Notice of Hearing in this matter. (Exhibit C)

5. Debtors' counsel attempted to reschedule her flight to return to Minneapolis, Minnesota on December 4, 2011, but the cost of rescheduling the flight at the time she attempted to reschedule the flight was prohibitive.

6. Debtors' counsel considered cancelling her attendance at the CLE seminar, but she is unable to reschedule a seminar in the month of December, 2011 which would provide her with the number of CLE hours she needs to obtain for her Minnesota CLE requirements for 2011.

7. Debtors' counsel is unavailable at the time of the scheduled hearing on the Motion to Lift Automatic Stay and Abandonment and her unavailability is for good cause.

WHEREFORE, Debtors' counsel moves the Court to reschedule the hearing now scheduled for December 5, 2011 for good cause shown and to continue the automatic stay pending rescheduled hearing in this matter.

Dated this 26<sup>th</sup> day of November, 2011.

*/s/ Wendy Alison Nora*

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